R E M A R K S

Careful review and examination of the subject application are noted and appreciated.

SUPPORT FOR THE CLAIM AMENDMENTS

Support for the claim amendments may be found in the specification, for example, on page 15 lines 1-5 and FIGS. 4-9 with associated text, as originally filed. Thus, no new matter has been added.

CLAIM REJECTIONS UNDER 35 U.S.C. §102

The rejection of claims 1-3, 8, 9, 11, 12, 19 and 20 under 35 U.S.C. §102(b) as being anticipated by Galbraith et al. '567 (hereafter Galbraith) has been obviated by appropriate amendment and should be withdrawn.

Galbraith concerns a parity block configuration in an array of storage devices (Title).

Claim 12 provides steps for (i) calculating a first parity item based on a first data block (written at a particular address in a first range of a first drive) and a second data block (written at the particular address in the first range of a second drive) and (ii) writing the parity item in a second range of a third drive. In contrast, Galbraith appears to contemplate that the data blocks used to calculate parity information are taken

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along a diagonal "stripe" in an address matrix (see column 3, lines 8-19). As such, the data blocks of Galbraith used to calculate the parity information are not at the same particular address of the disk drives as presently claimed. Therefore, Galbraith does not appear to disclose or suggest steps for (i) calculating a first parity item based on a first data block (written at a particular address in a first range of a first drive) and a second data block (written at the particular address in the first range of a second drive) and (ii) writing the parity item in a second range of a third drive as presently claimed. Claim 1 provides language similar to claim 12. As such, the claimed invention is fully patentable over the cited reference and the rejection should be withdrawn.

Claim 26 provides a steps for (i) generating a first mirrored data block by mirroring a first data block, (ii) writing the first data block in a first range of a first drive and (iii) writing the first mirrored data block in a second range of a second drive. Despite the assertion on page 4 of the Office Action (arguing original claim 4), Galbraith appears to be silent regarding mirroring data blocks. In particular, the cite in the Office Action to column 6, lines 10-15 of Galbraith only appears to discuss a RAID 5 system where redundancy is achieved by storing parity information. Furthermore, Tomaszewski does not appear to discuss mirroring to different ranges in different drives as

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presently claimed. Therefore, Galbraith and Tomaszewski, alone or in combination do not appear to teach or suggest the steps of claim 26. As such, claims 26-33 are fully patentable over the cited references and should be allowed.

CLAIM REJECTIONS UNDER 35 U.S.C. §103

The rejection of claims 4-7 and 10 under 35 U.S.C. §103(a) as being unpatentable over Galbraith in view of Tomaszewski et al., U.S. Patent Publication US 2002/0188800 (hereafter Tomaszewski) has been obviated by appropriate amendment and should be withdrawn.

The rejection of claims 13-16 under 35 U.S.C. §103(a) as being unpatentable over Galbraith in view of Cassidy '166 has been obviated by appropriate amendment and should be withdrawn.

The rejection of claims 17 and 18 under 35 U.S.C. §103(a) as being unpatentable over Galbraith has been obviated by appropriate amendment and should be withdrawn.

Galbraith concerns a parity block configuration in an array of storage devices (Title). Tomaszewski concerns a self-mirroring high performance disk drive (Title). Cassidy concerns a method and apparatus for distributing data across multiple disk drives (Title).

Claim 10 depends from claim 1 which is now believed to be allowable. As such, claim 10 is fully patentable over the cited

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references and the rejection should be withdrawn. Claims 4-7 and 13-18 have been cancelled.

Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative at 586-498-0670 should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge Deposit Account No. 12-2252.

Respectfully submitted,

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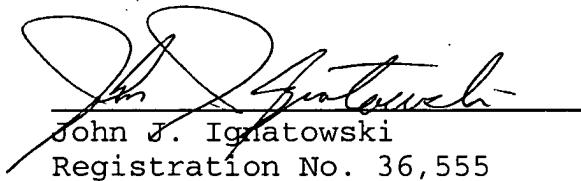
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Dated: <u>January 5, 2006</u>

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